

Chevron USA supports the comments filed by OOC in response to the proposed subpart K rulemaking. Chevron will be impacted significantly by the requirement to install meters on facilities on the OCS that process 2000 BOPD or greater. To that end, Chevron is concerned with the ability to comply with the regulations as proposed; especially as it relates to the installation of meters on existing facilities; the time period of 120 days to comply; and the measurement accuracy of $\pm 2\%$ expected on all measured vented/flared gas streams. Chevron supports the OOC and API and is committed to working with Industry and the MMS in the development of alternative approach to achieve the desired outcome. Chevron believes that the focus of both the Industry and the Agency should be one of reducing emissions associated with the producing activities on the OCS to the extent it is practical and economically feasible. By the development of a technical document /standard to direct Industry on how to properly account for gas volumes vented and flared, consistency in determining volumes vented / flared will be achieved across the OCS; the MMS will have better tools and information to assess compliance of operators; and solutions to reduce emissions will likely occur in a more timely fashion. In response to the question posed regarding the establishment of a technology preference of Flaring over Venting on the OCS, the selection depends on a multitude of issues and is very complicated. Chevron would however support that any regulatory direction established to address should be limited to new facilities only. As it pertains to existing facilities, MMS is encouraged to work with Industry in an effort to develop and promote best practice sharing to reduce overall levels of gas vented/flared which is in keeping with the expectations of the GAO report.